## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

WELLY CHANDRA, et al.,	)	
	)	Lead Case No.:
	)	18-cv-07686
Plaintiffs,	)	
	)	
V.	)	Honorable Thomas M. Durkin
	)	
THE BOEING INTERNATIONAL SALES	)	
CORPORATION, A Washington State Profit	)	
Corporation, et al.,	)	
	)	
Defendants.	)	
	)	

## **DECLARATION OF VIKTORS ANDRIS REKTE**

#### **DECLARATION OF VIKTORS ANDRIS REKTE**

### I, VIKTORS ANDRIS REKTE, declare:

- 1. I am a member of the California State Bar in good standing and I have personal knowledge of the matters referred to in this Declaration, and if called upon as a witness, could and would competently testify to the following:
- 2. I am the founder of Rekte Law. I have tried over 50 cases in my 33 years of practice.
- 3. Prior to starting my own firm, I practiced with Girardi | Keese and its predecessor Girardi, Keese & Crane ("Girardi | Keese") for 32 years from 1987 to 2019.
- 4. For approximately 20 years I managed the San Bernardino office of Girardi | Keese.
- 5. During my 32 years with Girardi | Keese it was my understanding that Tom Girardi was the sole owner of Girardi | Keese.
  - 6. During my 32 years with Girardi | Keese I was a salaried employee.
- 7. During the time I was employed by Girardi | Keese, it was always my understanding that the only person who could initiate wire transfers on behalf of the firm was Tom Girardi. As managing attorney of the San Bernardino office, I could not initiate wire transfers from either the San Bernardino or Los Angeles Girardi | Keese Trust Accounts.
- 8. During the time I was employed by Girardi | Keese, including the during the time I managed the San Bernardino office, I had no access to the accounting books and records of the firm.

Executed this 18<sup>th</sup> day of December, 2020 at Corona, California. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

VIKTORS ANDRIS REKTE

# **CERTIFICATE OF SERVICE**

I, Edith R. Matthai, the undersigned attorney, hereby certify that on December 21, 2020, I served a true and correct copy of the foregoing Declaration Of Viktors Andris Kekte upon all counsel of record via the Court's CM/ECF System.

/s/Edith R. Matthai	
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